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July 22, 2022

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SEC v. Ripple Labs Inc., et al., No. 20-cv-10832-AT-SN (S.D.N.Y.)

Dear Judge Torres:

Plaintiff Securities and Exchange Commission ("SEC") and Defendants Ripple Labs Inc., Bradley Garlinghouse, and Christian A. Larsen (collectively, the "Parties") respectfully request that the Court issue an order directing all non-parties (which have already received notification under the Protective Order) to submit any letters to seal or redact information in the Parties' *Daubert* Motions (ECF Nos. 532-549) by July 28, 2022.

In advance of the motions to seal being filed today by the Parties, the Parties have endeavored to provide notice to all non-parties whose confidential discovery material appears in the *Daubert* Motions to give them an opportunity to either consent to the Parties' proposed redactions or to meet and confer. *See* Court's Practice Rules, Rule IV(A)(ii); Protective Order, ¶ 15 (ECF No. 53). Significantly, most of these non-parties have responded to the outreach by communicating their support for, and consent to, the narrowly-tailored redactions relating to them that are reflected in Defendants' proposed redactions. Some non-parties, however, have either not responded or are still evaluating their position.

Given the Parties' desire to reach an expeditious resolution of all sealing-related issues concerning the *Daubert* Motions, the Parties respectfully request that the Court set a deadline of July 28, 2022 by which any non-parties must move to seal portions of the *Daubert* Motions or else waive any objections to the Court's ultimate ruling on the Parties' sealing applications. The Parties have submitted as Exhibit A hereto a Proposed Order reflecting this joint request.

Hon. Analisa Torres

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July 22, 2022

Respectfully submitted,

/s/ Ladan F. Stewart

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cc: All Counsel of Record (via ECF)